Developments of Regional Impact: A Program Analysis

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Introduction

Developments of Regional Impact are development projects that exist within the boundaries of one or more locality, but have implications for the region-at-large beyond the jurisdiction of the host government. These types of developments, which have significant implications for growth in intergovernmental coordination, regional land use, and capacities of public service systems, present a challenge to local governments. To deal with these impacts, these types of development are supervised by regional planning commissions at the direction of State Planning Acts. Regional planning commissions may use DRIs to direct development and manage growth on a broad, regional basis. Increasingly concerned with the effects of large unregulated developments within the state of Georgia, the Georgia Planning Act of 1989 requires that all developments that meet or exceed certain thresholds of development size should be subject to a review process prior to their implementation. The Developments of Regional Impact (DRI) program, supervised by the Atlanta Regional Commission(ARC), has been in place since 1984 to review, approve, and monitor large-scale developments in the Metro Atlanta Region. The process begins with a period of review and comment that allows the opportunity for interested parties to provide input on the impact that the development will likely have on transportation networks, sewer capacity, and natural resources, as well as the compatibility of the development with existing land use plans for the area. Though the DRI process is an accepted and routine policy, there is little monitoring of project implementation beyond the Review and Comment phase, and little research has been done regarding the realization of proposed projects.

It is the purpose of this paper to examine in greater detail the success or failure of Metro Atlanta's Developments of Regional Impact program, and to identify potential improvements to the program to encourage efficiency and further implementation. Research will examine DRI programs in other areas for a comparative review of benefits and drawbacks of each. Case studies will be used to illustrate the identified benefits within Georgia's program, and an implementation review will examine the historical catalog of DRI projects according to their level of completeness to form a picture of places for improvement within the DRI process. This research should build on a body of existing literature regarding the theoretical framework for the existence of DRIs including the governmental necessity for DIRs, a review of policy implementation theory, a review of characteristics of a DRI policy, and an overview of the DRI program of Georgia. With a full understanding of theoretical framework and contextual barriers to DRI implementation, the research will provide suggestions to increase the likelihood of full and effective implementation of developments of regional impact.

DRI Literature Review

Developments of regional impact are an uncommon practice in and of themselves, and literature about this specific program is scant as a result. A review of literature pertinent to Developments of Regional Impact will discuss the topics of growth management practices, policy implementation practices, and plan implementation. These fields are important in establishing legal foundations for the DRI program in Georgia, as well as identifying potential sources of implementation failure for DRIs that can be used to establish a framework for improvement.

DRI Foundations in Governance/ Growth Management Practices

Programs that track developments of regional impact are born of growth management practices and strategies of the legislating government. Growth management practices are put into place to ensure that services and infrastructure capacities are able to keep up with the increasing demands of a growing population. In many places and in Georgia, many growth management practices are the responsibility of a regional planning commission through regional planning policies that help shape development over a broader geography and multiple jurisdictions. Much of what we would currently recognize as commonplace regional planning policy is the subject of Fred Bosselman and David Callies' work, "The Quiet Revolution in Land Use Control". The quiet revolution refers to the creation of regional planning practices in response to a growing awareness about the impacts that the growth in one municipality may have over a much broader geographic area. Recognizing that these broadly impactful policies are subject only to the development laws of a small municipality, Bosselman and Callies argue that states have begun the silent revolution of broader, regional growth policies to help guide important developments according to goals created by the state. The authors provide a detailed report of what was at the time a revolutionary practice in land use policy that has now become the foundation for regional development authorities including ARC. It is precisely the large-scale developments with regional implications, such as DRIs, that these early legislations were concerned with and created to regulate. The quiet revolution in land use control has become the norm in land use control, as we now address problems off effectiveness in regional development strategies (Bosselman and Callies, 1971).

"The Quiet Revolution in Land Use Control" was published in 1971. David Callies updated the original work in 1994 in an essay titled "A Quiet Revolution Revisited: A Quarter Century of Progress" wherein he reviews many of the same programs from the original publication, with the notable addition of the Georgia State Planning Act of 1989. In his review, he makes mention of the DRI program as one component of Georgia's top-down approach to land use controls (Callies, 1994).

In a discussion about land use controls and growth management practices, the topic of state planning acts and their influence over regional growth patterns and growth management are common. State planning acts can help with infrastructure financing and particularly with a locality's ability to collect money from bonds for infrastructure improvements. These acts can also encourage the development of other growth management policies as was the case with the Florida Planning Act that instituted a DRI program throughout the state (Porter, 1990). As Raymond Burby and Linda Dalton argue, the presence of state planning mandates seems to have an influence on the implementation of state efforts to limit or control development as well. Through their analysis, the authors define a list of factors that make the implementation of land use and growth management policies more likely including local planning actions that support the policies, planning staff capacity, staff commitment to the policy being adopted, and community wealth (Burby and Dalton, 1994).

Further, Philip Berke and Steve French have identified some characteristics of state planning mandates that make implementation of the act's initiatives much more likely. First, state mandates with clearly specified goals are easier for local governments and organizations to implement. Second, the relative importance of a goal, determined by its prominence in the state act, will determine how seriously it is taken in local contexts. The third quality addresses the ability of the state act to enforce compliance from local governments; states with a greater ability to enforce or coerce will see better local implementation. Finally, the complexity of the intergovernmental relationship between the state and the enforcing body is important to compliance; localities with greater ties to the state are more likely to enforce state mandates more effectively in order to maintain a good working relationship between the two parties. The ability of the local government or other organization to comply depends on capacity, commitment, state implementation style (coercion capacity), and state implementation effort (funding) (Berke and French, 1994). These characteristics, while use as a standard to analyze local plans in this paper, are relevant to the implementation of all state mandates, including those governing Developments of Regional Impact by the Georgia Planning Act. These standards may be used to analyze the degree to which the Georgia Planning Act assists in the implementation of Developments of Regional Impact.

Policy Implementation

In a discussion of DRI implementation, it is important also to look at theories of policy implementation as they may be applied to these developments. Developments of Regional Impact are, as a whole, a program designed to review and monitor large developments in the Atlanta Region, and when viewed as a policy for growth management may benefit from policy implementation literature. To begin the discussion, Paul Sabatier categorizes approaches to implementation into two broad approaches; top-down, and bottom-up. Whereas a top down approach starts by analyzing the policy decision and the extent to which its objectives are attained over time, a bottom up approach identifies the actors responsible for

implementation on the ground level, and builds a network of stakeholders in the implementation process through contacts. The top down approach has the advantage of being able to incorporate a theoretical framework of goals into the analysis of implementation, but the bottom up approach is better able to identify unintended negative consequences of a program and recognizes more than just the central decision makers as having influence on the process, at the risk of overstating that influence (Sabatier, 1986). Analysis of these approaches to implementation helps to provide some insight into what problems DRIs may be having with implementation. In this case, top down analysis might suggest that it is a structural or programmatic issue, while the bottom up approach might identify issues with individual developments that lead to their unsuccessful implementation. In "Assessing growth management policy implementation" by Arthur Nelson and Terry Moore, the authors suggest that Georgia applies both top-down and bottom-up approaches to implementing growth management initiatives, as well as a third, lateral approach wherein governments at similar levels must cooperate with one another towards a cohesive growth management policy. A lateral approach to policy implementation relies on the communication and cooperation of multiple parties in order to gain a comprehensive understanding of the effects of a given policy. This is in contrast to the top down approach, which relies on implementation by an authority, or bottom-up, which relies on the experiences of actors in the field to gauge implementation success.

Regarding implementation of growth management efforts, the paper suggests that areas where urban centers have a greater amount of control over growth management initiatives are more likely to have successful growth management consistent with state initiatives. This is illustrated by Florida's DRI program, a program based on state support of local planning initiatives, to conclude that where local municipalities feel in control of their development and supported by state government, growth management policies are more likely to work (Moore and Nelson, 1996)

Mazamanian and Sabatier published a book titled *Implementation and Public Policy* which has been reviewed by Charles Lamb in *Policy Sciences* journal. Lamb highlights the reiterative process of implementation that the authors emphasize as a critical component to successful implementation. The three categories that Mazamanian and Sabatier identify as having the largest influence over policy implementation are the tractability of the problems involved, the extent to which statutes structure the effective execution of public policy, and variables that do not pertain to statues but that influence implementation. Tractability of the problems involved speaks to the identification of policy goals and the major factors that affect those goals. Statutory structure tries to avoid conflicts between the stated goals in the initial statute and goals that emerge later in subsequent policy objectives. Non-statutory objectives deal with people; they organize policy makers into specific roles for targeted groups and administrators, gain a supportive constituency, and suggest designating an agency to implement policy objectives (Lamb 1984). In applying this to Georgia's Developments of Regional impact program, it would be important for

the DRI policy to clearly state its goals and intentions, to effectively manage all players involved in implementing the directive, and to ensure that there are no additional statues that conflict with the objectives of the DRI program.

Plan Implementation

More closely related to the question of DRI implementation, implementation theory as it relates to plans and the work of city planners has been written about within the field of plan implementation. Implementation of plans usually requires some sort of exercise of the police powers to regulate the private development of land. Legally, plans are implemented through a few avenues including regulation, public investment, administrative processes and citizen participation. The government has the right to regulate the types of development that may be built in certain places. Accordingly, plans that do not comply with this regulation risk not being implemented. This is frequently the case where the DRI report shows that the proposed development does not fit within the existing zoning regulations. Further, large public investments and infrastructure can guide development by determining where services will be accessible and therefore where a project may be viable. If a DRI is proposed in a location with no access to water or connectivity for transportation, it may be less likely to be implemented. Administrative influence on implementation deals with the acceptability of a proposed plan to the influential voices in an area. Plans must be reasonable and make sense to the municipalities decision makers in order to be approved. Similarly, the opinions of citizens matters when designing and implementing plans. Citizen participation in plans builds trust and stake in the plans and increases their likelihood of implementation (So, 1988).

The systemic factors that influence plan implementation are important to keep in mind when analyzing the success and failure of plans, but aside from these structural factors, plan implementation theorists have proposed a number of highly technical influences on plan implementation. In her piece "Do Plans Get Implemented? A Review of Evaluation in Planning", Emily Talen distinguishes between the various types of theory on plan implementation that existed at the time. She categorizes plan implementation theory into seven total types of analysis: the evaluation done prior to plan implementation including evaluation of alternative plans and analysis of planning documents, the evaluation of planning as a practice, including studies of planning behavior and a description of the impacts of plans, policy implementation analysis, and both qualitative and quantitative evaluation of the implementation of plans. Talen admits though, that while much research has been done in the field of policy implementation "planners have yet to make a similar revelation about whether or not and to what degree plans are actually implemented." She, like Mazamanian and Sabatier, suggest that it could partially due to weak plans and unclear goals that make the outcome of those goals difficult to measure. Other issues she identifies in our ability to evaluate the success or failure of plans are planning's effects on change, how we are defining the meaning of success, multicausality, and issues with quantitative evaluation in planning. Plans are created in order to adapt to changing realities in population growth and

development, but much of the time evaluations still retain a certain rigid adherence to these plans, which colors the outcome of an implementation review. Plans should evolve over time to adapt to new information, which ultimately makes it difficult to analyze their success or failure in implementation. Instead, we should seek to identify the goal of the plan and evaluate plans based on whether they have succeeded in managing and guiding new growth. The multicausality issue also plays heavily into the analysis of DRI implementation. There are so many factors that may influence the success or failure of a plan or development that it is difficult to pin that success or failure to a consistent set of variables. Here again, we should try to assess the linkages between the intentions of the policy and the ultimate outcome of that policy. Talen says, "By focusing on the goals explicitly engendered by planners in the plans they produce, explanatory chains are not vital because the question to be addressed is more black and white: Were goals achieved or not? This question is quite different from asking whether or not planners were responsible for creating a particular urban development form." This is important to keep in mind as we assess the success and failure in implementation of certain DRI developments in our study.

Program Comparisons and Comparison Matrix

Georgia Developments of Regional Impact Program- Overview

To begin to talk about the Development of Regional Impact program in Georgia, you must start by talking about the 1989 Georgia State Planning Act. The 1989 Act requires submission of proposed developments that meet the guidelines for developments of regional impact. This statute also establishes the authority to review plans with the state's regional commissions, and the ability to set rules and procedures, as well as the standards and guidelines for DRIs within the Department of Community Affairs. Finally, the act stipulates that after review the development will be found within the best interest of the region and therefore the state, or not in the best interest of the region and state (Georgia Planning Act. 1989).

The rules of developments of regional impact are explained further in the Rules of Georgia Department of Community Affairs, Chapter 100-12-3. The chapter outlines the purpose of the DRI program, which aims to guide growth and development under a cohesive vision to ensure an overall benefit of large-scale developments. The rules also explain the responsibilities of local governments and regional commissions, including penalties for failure to submit a project that meets DRI thresholds for review. There are not many penalties for projects that are out of compliance. A first offense warrants a meeting with the appropriate regional commission to inform the locality of DRI rules, and the second offense within two years may result in the suspension of the locality's Qualified Local Government status for up to one year, resulting in some loss of funding for municipal programs. In the final section of the rules for Developments of Regional Impact, the document outlines the thresholds for various types of development that will trigger a DRI review. The rules guide thresholds for developments from commercial, to residential, to truck stops, water treatment plants, and correctional facilities. Further, with the 2014 revision of the DRI review process, reviewers are asked to vary thresholds based on the development of the character area based on ARC's Unified Growth Policy Map (DCA Rules, 2014).

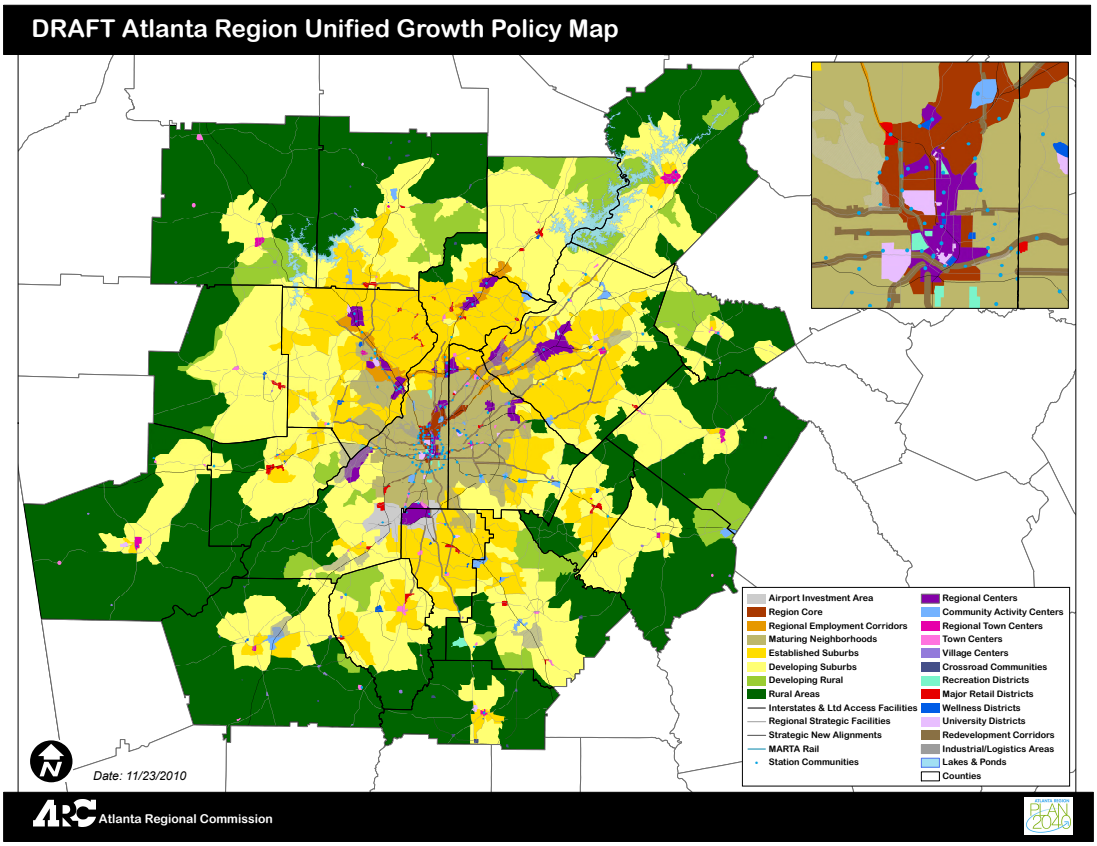

Figure 1: Atlanta Region Unified Growth Policy Map

Under the old rules, a 400,000 square foot office development in any area would be sufficient to trigger DRI review. Under new revisions, however, 400,000 square foot developments will trigger review in a rural or developing rural area, while suburban developments may be up to 500,000 square feet without triggering review, regional development centers may develop office up to 600,000 square feet, and office developments under 700,000 square feet in the regions core will not trigger DRI review. Further, residential thresholds are 700 units for developments in the urban core, 600 units in regional development centers, 500 units within suburban regions of the Atlanta metro, and 400 units in rural and developing rural areas. A thresholds table that describes trigger thresholds by land use is available for further review in the index.

It is important to note that municipalities are able to go ahead with preliminary processes for the development while the DRI is still under review, and many developments do take advantage of this. Included in the rules that determine whether a project is a DRI is the provision that the regional commission may wait to review an application until after all such initial changes, such as necessary changes to the zoning code, have been finalized. Though available, it seems that this option is rarely employed. Many of the DRI review sheets record inconsistent zoning between the municipality's future zoning map and the development's required land use, which could eventually result in an incomplete project. Delaying project review

until all necessary conditions for development should be explored as a way to increase successful implementation of DRI projects.

These rules have been subject to change in the recent past in an effort to adapt rules to reflect changing population and development patterns. These changes come following changes in Georgia's business climate and include revised DRI thresholds, greater variation in the type of development considered under DRI review, and changes to the communication procedures for the review and comment process. These changes allow for greater flexibility in thresholds according to their location within the region, and institutes an expedited review process for those projects that advance particular goals of the ARC including participation in the Livable Centers Initiative, Transit Oriented Development, and limited trips generated by the DRI (Synopsis, 2012).

The current review process for Developments of Regional Impact as defined by the Department of Community Affairs' Rules for DRIs begins with a "request for application" completed by the host government and submitted to the appropriate regional commission, the Georgia Regional Transportation Authority, and the Department of Community Affairs. These parties determine whether the development meets DRI thresholds and therefore requires additional review. If it is decided that the development is a DRI, then the regional commission is responsible for circulating a notice to affected parties for their review and comment; affected parties may include neighboring municipalities, transportation or transit authorities, applicable natural resource departments, or any other public entity whose operations may be affected by the large development nearby. After the review and comment period closes, a DRI report is completed and includes basic information about the development as well as comments from affected parties regarding its feasibility and appropriateness. The DRI report given to the host government is purely advisory. It is intended to be taken into consideration by the jurisdiction, but is in no way binding or infringing upon the jurisdiction's ability to make decisions. After this review process, no further action is taken to record implementation success or failure, leaving the DRI catalog as an inaccurate collection of proposed regional developments with no record of implementation.

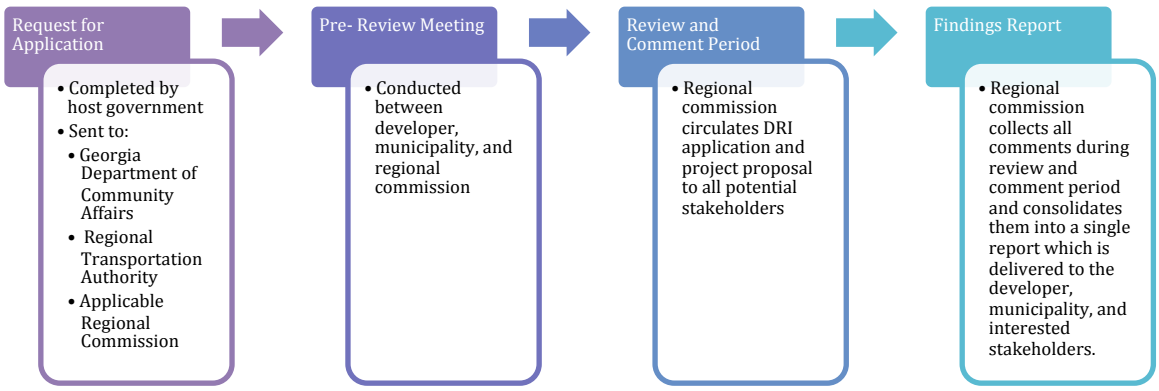

Figure 2: Georgia DRI Review Process

Chicago Developments of Regional Importance Program- Overview

The process of implementing a review program for large scale developments in Chicago has, as the first of its kind in the state and the region, been a process of trial and error. The process began in October of 2007 with a mandate from Senate bill 1201 that the Chicago Metropolitan Agency for Planning (CMAP) would be charged with creating a process to review what they called "Developments of Regional Importance" (DRI) in the Chicago Metro. After some revision, the program was approved initially as a two year pilot in 2009, reapproved for a second trial in 2011, and approved once more to become a permanent program in June 2013. (Developments of Regional Impact, CMAP.)

Chicago's DRI program is intended to provide a process by which to review those developments that will have some impact beyond the jurisdiction of the permitting municipality. CMAP recognizes DRIs as an opportunity to open lines of communication between municipalities, create inter-agency and governmental cooperation, and develop in a way that is consistent with Chicago's long term comprehensive plan, *Go To 2040*. The program is legislated through Section 47 of Illinois Public Act 095-0677 which states that "The Board shall consider the regional and intergovernmental impacts of proposed major developments, infrastructure investments and major policies and actions by public and private entities on natural resources, neighboring communities, and residents." (CMAP Staff, 2009) This requires CMAP to form a set of standards that DRIs will be measured against, requires submission of a DRI application by projects that meet these standards, and allows CMAP to review the application and comment on its appropriateness and consistency with other plans for the area.

The process of DRI review begins with a request for review of a new development that may be made by municipal or county resolution, A CMAP board member, a majority of votes from the CMAP Coordinating Committee, or a project sponsor. The process may begin in earnest only after a privately funded development has filed for, and gotten approved, the necessary changes to the zoning code in order to proceed with development and a public development has been programmed for preliminary engineering. In the case of private development, the DRI designation must be made before development rights are issued to the developer. For publicly owned projects, DRI designation is awarded before the project is programmed for construction. This ensures both that each project is consistent with the host municipality's zoning ordinance, and that the developer has some legitimate and demonstrated interest in the implementation of the development.

The thresholds established by CMAP that will trigger requirement of a DRI review are considerably smaller and less nuanced than those established for Atlanta's DRIs. They are as follows:

1. The project is estimated to generate or divert more than 50,000 auto vehicle trips (or truck equivalent) per day on the region's highway system.
2. The project is estimated to add a net discharge of greater than 5 million gallons effluent per day

3. The project adds greater than 500 acres of impervious paved surfaces and rooftops.

Just one of these conditions needs to be met in order to trigger DRI review, and if the development is sited within 100 yards of a stream or natural area, the thresholds are reduced by half (25,000 auto trips, 2.5 million gallons, or 250 acres of impervious surfaces). These conditions center around automobile externalities as a means of protecting the natural environment and mitigating the impact of large developments on Chicago's natural resources (*Chicago Metropolitan Agency for Planning: Developments of Regional Importance*, 2008).

The DRI request is processed and sent to the board for approval subject to adherence to all above conditions, and if approved CMAP will produce an advisory report on the project. The advisory report gathers any necessary data from the relevant municipality and analyzes impact on the natural environment, water supply, sewer, storm water, road capacity, regional transportation facilities, land use patterns, and planned or existing public investments. The suggestions made in the advisory report are just that, advisory, and bear no enforceable impact on the development. After the publication of the advisory report, the process is considered completed, and there is no further review of the project (*Chicago Metropolitan Agency for Planning: Developments of Regional Importance,* 2008).

There is no monetary cost for DRI review, and accordingly no monetary reward to those undergoing the review process. Reward may be considered the approval of CMAP and associated confirmation that the project constitutes good planning. Finally, it should be noted that there are other regulatory processes governed under CMAP, but the DRI process is intended to address specific impacts on regional resources belonging to multiple municipalities. Though the process is not state-wide, it does have a regional scope as it involves all seven counties considered part of the Chicago Metropolitan region.

Given the effort put into establishing a DRI review program in combination with the relatively low capacity standards that will trigger DRI review under the Chicago program, it may be surprising that since the programs establishment in 2009 there has not been a single DRI review conducted. The Chicago DRI program is a very new program, and as such does not have the necessary resources committed to its success. There is a deficiency of staff assigned to review DRI applications, and no staff time is given to reviewing and remediating noncompliant developments. More importantly, the organization under which rules for DRI review were developed, CMAP's Programming Coordinating Committee (PCC) no longer exists under the current committee structure. Without interest in the implementation of the DRI program following the dissolution of the PCC, the program has not been called upon to do a single review (Clark, 2016).

Chicago's program was largely modeled after the program that exists in Georgia and the lessons that it has to offer may be expected to mirror Georgia's, but that in the absence of any existing reviews, there are few lessons to be learned from

Chicago. If there is one lesson to take away from he Chicago DRI program, it is that regional development commissions should try not to dissolve the committee that created the process and would presumably be interested in its success, before the program is established solidly within the region.

Florida Developments of Regional Impact Program- Overview

Compared to the previously reviewed DRI programs in Atlanta and Chicago, the Developments of Regional Impact (DRI) program in Florida involves a more complicated set of rules and laws, and exercises greater oversight over projects through implementation. Though intent and implementation may be different, Florida's DRIs have a familiar definition- "…any development which, because of its character, magnitude, or location, would have a substantial effect upon the health, safety, or welfare of citizens of more than one county." Monitoring of Developments of Regional Impact dates back to 1972 as an attempt to preserve and monitor natural resources under the Florida Environmental Land and Water Management Act. Florida DRIs are used as a growth management tool, and predate any local comprehensive planning. They still play an important intra-jurisdictional role in shaping development, whereas comprehensive plans are involved with only one jurisdiction at a time.

The Florida DRI process has changed over time in response to threat and criticism, and although the DRI review and revision process has never been eliminated entirely, the size and scope of developments eligible for DRI review has been reduced over time. This has resulted in reduced thresholds and an increasing number of exemptions for projects that will not have to undergo a DRI review. Thresholds for development are dependent on land use type; land uses that are considered in DRI applications include attractions and recreational facilities, office parks, schools, residential developments, retail space, commercial vehicle space, and mixed use developments. Ironically, several large and potentially harmful uses have become excluded throughout the reiterative process of revision including airports, power plants, transmission lines, industrial uses, hotel/motel, mining, petroleum storage facilities, port facilities, marinas, and hospitals. (Committee on Community Affairs, 2011)

The DRI application process begins with a pre-application conference between the developers and the regional development authority and the process centers around a Development Order. A development order is a legally binding contract within the State of Florida that commits the developer to continuation and completion of the project barring other unforeseen circumstances. After the pre-application process, if the project is deemed feasible and the application demonstrates sufficient methodology, the project is applied for within one year of acceptance and moves into the sufficiency review stage. Sufficient methodology, in the context of the Florida DRI process requires an agreement between the developer and the applicable government about the methodology that will be used to answer the questions involved in a DRI review. Then, during sufficiency review, all of the

necessary documents for the application, completed using the agreed upon methodology, are collected before the regional planning agency begins the review process. This ensures that the regional planning authority is presented with complete information about the project and no additional time is spent collecting documentation. Once all necessary documents have been collected and deemed sufficient, the applicant schedules a hearing with the appropriate jurisdiction where they may apply for the aforementioned development order in order to proceed with the project. Within 50 days of the development order hearing, the regional planning authority will put together a review and recommendations on the project regarding the potential regional impact that the impending development may have. This review and recommendations document, called the regional report, reviews the DRI project for compliance with state and local laws, and asses the impact that the development will have on wildlife resources, historical resources, hazardous materials, wastewater, solid waste, transportation, air quality and housing. According to this analysis, the regional report contains suggested conditions put upon the development order that then must be followed in order for the development order to be considered valid. Following the regional report, the applicant has 45 days to appeal the decision and suggestions made regarding the development order, after which time the order is issued and the developer may begin building the project (Cambric, 2016).

Development orders are subject to review every two years, for the duration of the life of the development order, which can be up to 30 years. Florida DRIs therefore require follow-up and analysis on the progress that has been made by the project. Each time a development order expires and a new one is issued, the project must undergo this same process of review and recommendation. Significant efforts are made in Florida to follow up on the implementation of projects largely owing to the role of the development order in the process (Cambric, 2016).

Florida has identified five major benefits to the DRI program, which are applicable more broadly to any of the DRI programs detailed above. These benefits include "improved large scale development, coordination, regional perspective, technical and planning assistance, and vesting". Improved large-scale development speaks to the way that developments improve when there is some coordinated effort and monitoring regarding these large and regional planning developments. When developers know that their plans are expected to fit in to existing planning efforts, it results in better plans. The second benefit, coordination is an obvious and intended benefit of developments of regional impact. DRIs require local jurisdictions to work together to ensure that developments are consistent with all existing statutes. In Florida particularly, the DRI process consolidates the process of permitting the development in multiple jurisdictions, allowing the developer to proceed with construction faster and ensuring that all conditions are met for the development. The benefit of regional perspective speaks to the utility of the DRI process as a regional growth management tool. The DRI process, unlike the comprehensive planning process has the ability to require multiple jurisdictions and authorities to work with one another. The process also provides technical

assistance in getting these developments into compliance that some smaller jurisdictions may not have had on their own. The final benefit, "vesting" is specific to Florida and the development order. Because Florida issues the development order to the developer at the end of the DRI process, it can be said that the developer has a vested interest in the development and it makes it more likely that they will follow through with implementation of the plans. This is made possible through the heavy top down approach that Florida has taken to the DRI process. (Committee on Community Affairs, 2011)

There are many lessons to be learned from the Florida program, and while not all of them may be applied directly to the Georgia program, there is a lot to be gained from applying these lessons within the lateral development context in Georgia. Florida has lost a lot of authority in the DRI process through the introduction of exemptions into the process. While an occasional DRI exemption may be necessary, it is not advisable to include them as a component of the program as a whole because it establishes somewhat arbitrary conditions regarding which types of land uses are included in DRI review and which aren't. Further, this could allow for favoritism for certain industries and unintended consequences for others. Regarding positive suggestions from the Florida program, Georgia's DRI program would benefit from the idea of vesting- using the DRI process as a way to encourage investment in the process by Developers. If the developer has some skin in the game, the likelihood that the project will be implemented is higher, increasing the overall effectiveness of the DRI program.

Policy Comparison Matrix

We will now turn to a comparison of each of the DRI programs in Georgia, Chicago, and Florida, and compare the strengths and weaknesses of each program through an analysis matrix. The categories that each program will be evaluated on include: technical feasibility, economic and fiscal possibility, political viability, administrative operability, and reversibility. Technical feasibility describes the effectiveness and adequacy with which a program addresses the problem it is meant to address. Economic and financial feasibility describes the fiscal costs and benefits of the program, as well as the societal costs and benefits. Fiscal costs consist of costs to the government or agency administering the program, and fiscal benefits are benefits to a public agency or benefits to the public good as a whole. Societal costs encompass any expenses or damages borne by individuals in society as a result of the policy, and societal benefits would therefore be the increase in individual welfare gained from implementation of the policy. For the purposes of scoring, high costs and low benefits (fiscal or societal) will result in a low score, and low costs and high benefits (fiscal or societal) will result in a better score. The next criterion, political viability, is the likelihood that the program can be implemented and administered within a given political environment. This will obviously vary based on the location of the policy and the political climate of that area. Administrative operability of the policy describes the administrative capacity necessary to put a

policy in place, and may include things like staff time, the necessity to hire additional staff, enforcement staff, and other programs or equipment necessary to implement the program. If the administrative burden on a locality is high, the score for administrative operability will be low. Each of the DRI policies outlined above will be evaluated according to these categories, and will be given a score of one to five for each. One is the lowest score, and five is the highest. A summary of the results is contained in the comparison matrix in the index.

Florida's program is a highly effective regulatory program of large-scale developments, but this comes with certain costs to the administering agency as well as fiscal costs in order to maintain a fully operational program. The program accomplishes its aims regarding the technical capacity of the program. Of the three programs examined here, Florida's is the most robust regarding policy rules and regulations, enforcement, implementation, as well as tracking the resulting impact of each DRI project. Effectiveness speaks to how well the implemented policies in the program achieve the goal of the program. In the case of Florida, a high level of implementation monitoring is necessary to track environmental impacts of large developments, and the use of DRIs are effective to this end. Florida's process of monitoring throughout and after the whole process ensures that Florida's DRIs adequately serve the purpose of monitoring and tracking the environmental impact of large developments at a very high level. Therefore, Florida receives the highest marks in both categories of technical feasibility. Operation at such a technically high level does require a significant commitment of resources from the Florida government, Florida therefore scores lower than other programs in terms of fiscal costs, societal costs, and administrative operability of the program. Though Florida DRI program administrators might argue otherwise, the fiscal benefits of tracking large-scale developments are not as fruitful as other forms of economic development. Societal benefits, however, of having a record of developmental impact on natural resources are high and Florida scores well in this area. The political viability of this program is based on the location in which it was being implemented. A program involving a component called the "development order" may not be practical for implementation in a state with few business controls, while it would pass easily in a state with strong environmental interests. DRIs have not passed without contest in Florida, and in an economy recovering from the recession there were many attempts to repeal the law, almost eliminating it entirely (Anderson, 2015). For this reason, Florida scores low on political viability.

The program in Georgia requires a smaller commitment of resources and administrative capacity, comparatively. Georgia's DRI program as it is currently implemented is a tool used to facilitate communication between interested stakeholders of a development including the governing authority, transit authority, and neighbors to the development site. This is intentional and in many cases may avoid future litigation from a party who wants to contest the development. The program does not however have any enforceable authority over the outcome of the project and findings from the DRI report do not have to be implemented into the plan. Further, beyond the beginning stages of development, the program has no

oversight over implementation of projects that have been reviewed in the past. To the end that the Georgia DRI process intends to encourage discussions between project stakeholders, it is successful. This is reflected in a mid-range score for effectiveness. To the end that it aims to influence and track large developments in the region, it leaves much to be desired, and scores low in the category of adequacy. There is more that may be done to achieve the goal of tracking the impacts of big development in metro Atlanta. Atlanta's light enforcement does come with certain benefits, including low fiscal costs to the government and low administrative operability costs. It is an easy system to implement and requires relatively little oversight to implement. This however, diminishes the fiscal and societal benefits that could be gained by better implementation tracking. The program as it has been implemented in Georgia is low cost and low reward. This is not unintentional, given the political environment in which it has been implemented. In order to be politically viable in the state of Georgia, the DRI program needs to interfere with development as little as possible. This creates a highly politically viable program as it currently exists with no measures for requiring change or tracking implementation.

Finally, the Chicago program is an interesting case study to compare to the two operative programs in Florida and Georgia given the fact that the Chicago Metropolitan Agency for Planning (CMAP) has not been called on to do a single DRI review since its creation. Therefore, there is little we can say about effectiveness or adequacy without an empirical application of the program. The fiscal costs of a non-implemented program are very low, though the societal costs of unmonitored large growth could be very high, though without review of the program it is difficult to determine how great societal costs are. Given that the program is at the moment entirely conceptual in Chicago, government benefits, societal benefits, and societal costs are all low. Low demands on any sort of administrative resources leads to a higher score in "administrative operability" if only because it requires such little dedication of resources. Political viability in this instance is an interesting question, because nothing in particular has happened to gain political opposition, political opposition could be the cause for the inaction in the first place.

It is clear that these three different programs vary greatly according to the measurements of technical feasibility, economic and fiscal feasibility, political viability and administrative operability as presented here. There are some trade-offs that emerge between effectiveness and adequacy and the costs of maintaining the program. While Florida's program is highly effective, it is also costly and difficult to implement and maintain. On the other had, Georgia's program is politically agreeable to the detriment of effectiveness and adequacy. Potential resolutions to the technical feasibility and cost feasibility dichotomy are presented in the section titled " Suggestions and Next Steps".

Case Studies

In order to get a better understanding of the strengths and weaknesses of the DRI program specifically in Georgia, I take two approaches to demonstrating different sides of the program. First, an analysis of case studies for developments of regional impact projects from the same developer through time will demonstrate the strengths of the Georgia DRI program to encourage intergovernmental coordination, and to produce better developments. Second, a review of DRI projects in the Metro Atlanta area between 2002 and 2008 will highlight some challenges the problem faces moving forward.

Perimeter Place

The first reviewed development is from August 2003, and is a proposed redevelopment of two existing office towers in northern DeKalb County just north of Perimeter Mall. The original proposed development would included 526,000 square feet of commercial/retail space, including a big box complex, a bank, and other smaller restaurant and retail options. Thresholds for retail developments required that developments over 300,000 square feet be reviewed as a DRI, so the 526,000 square foot development was required to go through the process. The proposed development also includes 45,000 square feet of office space, on the upper levels of five buildings. Per DRI review requirements, the original proposal was submitted and subject to a period of review and comment from all potentially interested parties. In the case of the Perimeter Place development, the proposal was reviewed by the transportation and environmental protection divisions of the Atlanta Regional Commission, as well as DeKalb County. The review findings for this first proposal identified a number of inconsistencies and potential issues with the original plan. The location of the Perimeter Place project puts it within the boundaries of an ARC Livable Centers Initiative (LCI) Zone. As it was proposed, Perimeter Place development did not meet the LCI standards for a live/work/play community, with no residential units creating a job to housing imbalance, an inadequate level of density in a central activity center, and a lack of buildings that address the street in a way encouraged in the LCI program. Further, as part of the review, all proposals are subject to comparison with the region's Regional Development Plan standards, which further require that the plan encourages access by some form of transportation other than a single occupancy vehicle, and includes some sort of greenspace in addition to the LCI measures above. In response to the violation of each of these standards, the original plan was determined to be not in the best interest of the region and therefore the state (Atlanta Regional, *Perimeter Place,* 2004).

Though the finding is a suggestion, rather than a prescription for change, in many cases developments will consider revisions if their proposal is found to be not in the best interest of the region. This was the case with Perimeter Place development, and after the ruling on the DRI was reached, the proposal was revised

to reflect the suggestions that were made regarding compliance with the LCI and the Regional Development Plan. The final development that was proposed included 455,000 square feet of retail, 45,000 square feet of office space, and 550 residential units at the suggestion of the review report. The inclusion of residential on the side balanced the live/work ratio, and provides a variety of housing options and higher density in an area that was previously lacking both. The development also included bicycle and pedestrian accessibility and is along a transit route so that residents and shoppers have multimodal transportation options. In this particular case, the suggestion that the development was not in the best interest of the state was sufficient to encourage the developer to alter the plans to create a proposal that was more aligned with the goals that had been established for the Metro Atlanta Region. This is an early example of the influence that DRIs may have on the shape of a single development, and we see this shape continue to change as regional development standards become more common and better defined, leading to easier implementation. Figure 1 shows the final proposed site plan for the proposed Perimeter Place development for comparison with future case studies (Atlanta Regional, *Perimeter Place,* 2004).

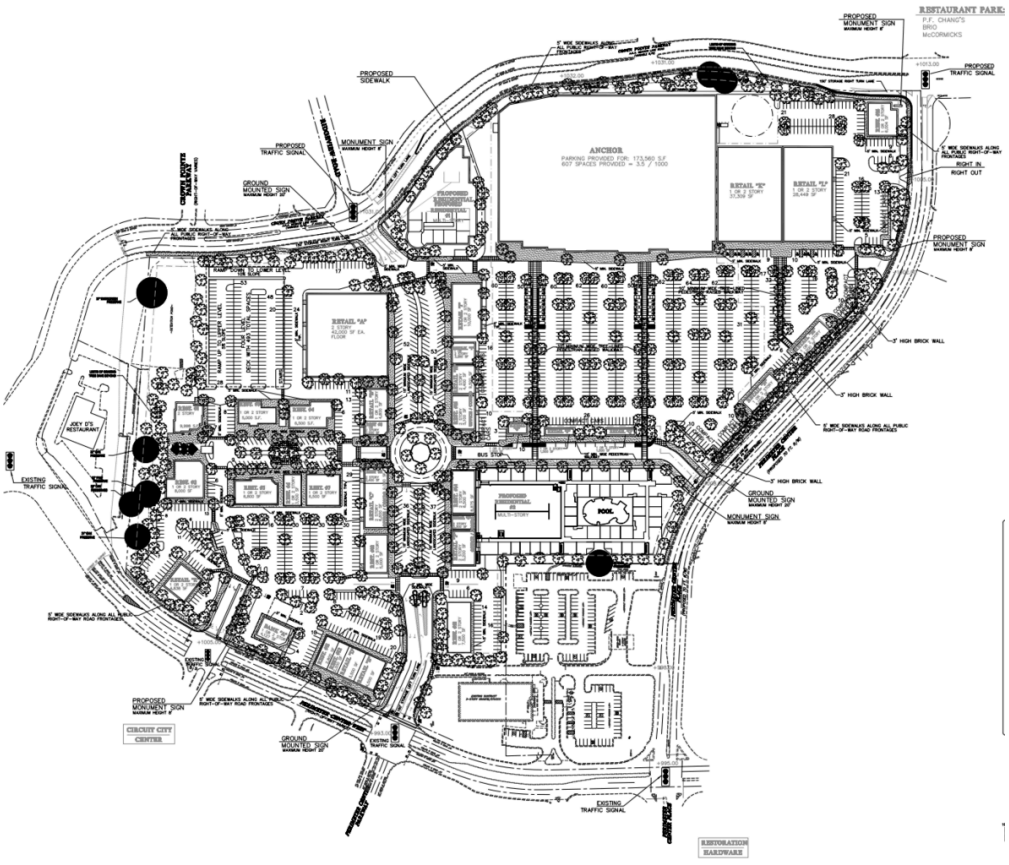

Figure 3: Perimeter Place Site Plan

Brookhaven Retail

The second case study included here is a mixed use development in DeKalb County along Peachtree and Hermance Roads. The uses include 600,000 square feet of retail, 150,000 square feet of office, and 1,700 residential units. Residential unit types include 800 apartments, 80 townhomes, and 820 condominiums. The triggers for review as a DRI in this case include the retail use, which exceeds the 300,000 square foot threshold, and the number of proposed residential units which, at 1,700 far exceed the established standard of 400 units at the time. In keeping with DRI review procedure, the proposal in this case was sent to a number of ARC agencies, the Georgia Department of natural resources, Georgia Department of Community Cffairs, Georgia Department of Transportation, MARTA , City of Atlanta, DeKalb County, DeKalb County Schools, Fulton county, the City of Doraville, Georgia Conservancy, and the City of Chamblee. The breadth of actors involved in the review and comment process increases the depth of comments and the collaboration between the developer and all potentially affected parties. The request for comments returned a number of concerns about the project, including inconsistent zoning with the DeKalb County future land use plan and a number of transportation concerns expressed by MARTA. Transportation concerns expressed by MARTA during the review and comment process include road capacity concerns, biking and pedestrian infrastructure, and MARTA expressed some doubt whether the Brookhaven MARTA station, nearly a half mile away from the development would really be used by either residents or shoppers to access the property (Atlanta Regional, *Peachtree and Hermance Roads,* 2006).

In response to these criticisms, MARTA bus route 41 was rerouted from its original route so that it would travel along the property in order to provide visitors and residents with a viable transit option for getting to the site. In order to accommodate this, the developer was asked to restructure the development to activate the road along the bus route in order to become a more inviting and welcoming environment for pedestrians. In addition to the public transit rerouting, a shuttle to and from the Brookhaven MARTA rail station was proposed as a more direct option for incorporating public transit.

By involving and engaging with regional partners and stakeholders to the site, the proposed development was improved through its requirement to address Hermace Road and to incorporate a connection to public transit, making the space more accessible and more equitable, providing access through multiple modes of travel. Furthermore, in comparing this site plan to the Perimeter Place proposal from 2003, there is a notable improvement in the quality of development between Perimeter Place and Brookhaven retail. Brookhaven retail addresses the street more often, engaging pedestrians and transit riders, it has less parking, and includes a wider variety of housing options, increasing housing diversity and affordability options. Further, these improvements and considerations were included in the original proposal, which did not have to be revised in order to fit with the Regional Development Plan. This speaks to the influence that the oversight involved in the

DRI process has had on the quality of large scale development proposals in the region in the long run (Atlanta Regional, *Peachtree and Hermance Roads,* 2006).. A photo of the proposed Brookhaven Retail site plan is included for comparison in Figure 2 below.

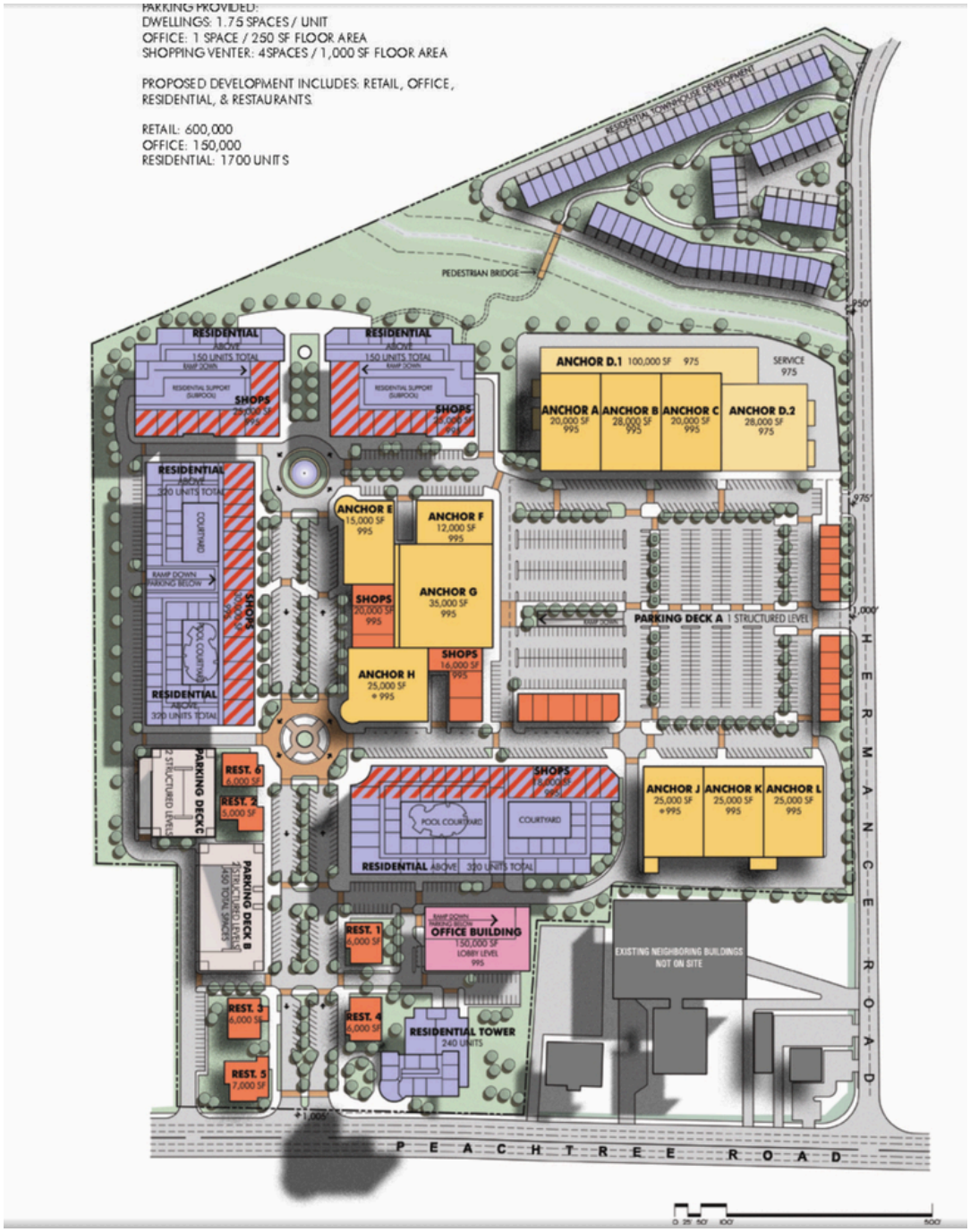

Figure 4: Brookhaven Place Site Plan

Lindbergh Plaza

Lindbergh Plaza is a proposed mixed-use site in the heart of what is defined as one of the most intensely developed areas both in the region and in the City of Atlanta. The uses would include 330 residential units, a 96,369 square foot grocery store, 17,700 square feet of other retail uses, and a 45,000 square foot fitness center. The combination of grocery retail and other retail uses combine to trigger DRI review under retail threshold standards. The proposal was sent to a large number of stakeholders including all ARC divisions, the Georgia Departments of Natural Resources, Transportation, and Community Affairs, Fulton and DeKalb Counties, the Fulton County School System, the Buckhead CID, and MARTA and the Georgia Regional Transportation Authority. The Review and Comment process went smoothly for this development, with regional planning requirements and expectations well established by this time. The proposed development includes a mix of residential and commercial uses, is near a transit station, includes a variety of transportation uses, and is consistent with the City of Atlanta's future land use map. This development was able to easily get through the DRI application process through familiarity with and adherence to planning practices suggested by the Atlanta Regional Commission without imposition of harsh penalties, binding legal contracts, or expensive application processes (Atlanta Regional, *Lindbergh Plaza,* 2007). The site of the Lindbergh Plaza development is shown in Figure 3 below.

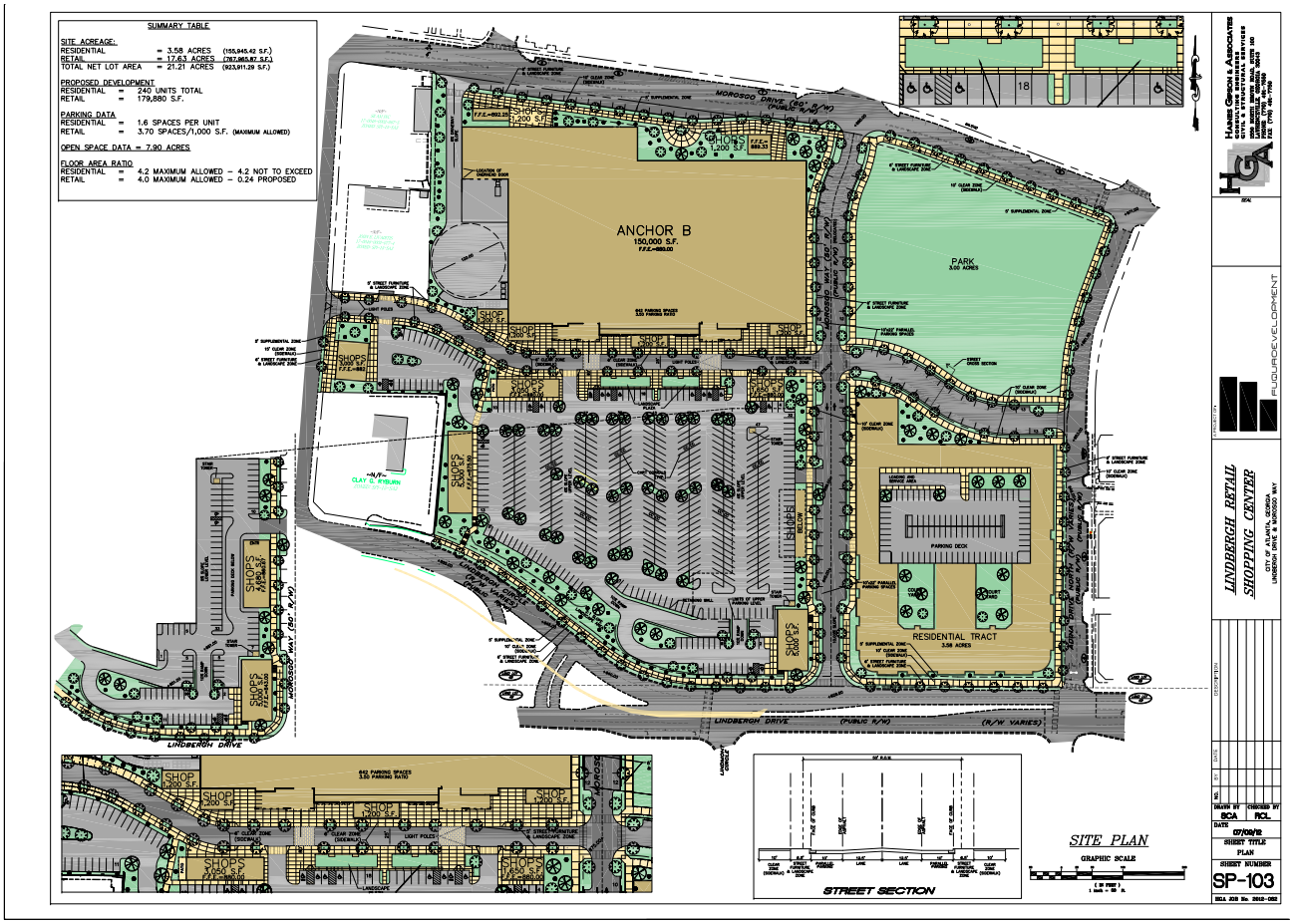

Figure 5: Site Plan for Lindbergh Plaza DRI

It is evident over the course of the three projects that continued commitment to the Regional Development guidelines by ARC staff has encouraged developers to be more conscious about their developments and to plan according to the best practices established through existing guidelines. As developers internalize and follow these guidelines, the region receives better developments as a whole, as can be seen in the evolution of the projects described above.

Implementation Review

It has been made clear through the analysis of case studies of previous projects that there is much good to come from the DRI process in Georgia. But are these projects typical? Do they represent a typical DRI project, or do we even know? In the case of the Georgia DRI program, because there is no method for review, not much is formally known about the rate at which these projects are actually built after going through the DRI process. Failure to track implementation of projects creates an incomplete record of this type of development, which then cannot be built upon in the preparation of future DRI reports. It also creates an incomplete picture of the overall effectiveness of the program, as the memorable projects are likely to be those that are completed.

In order to get a cursory idea about the level of implementation of DRI projects, I completed a brief version of an implementation review for the Metro Atlanta counties of Cherokee, Clayton, Cobb, DeKalb, Douglas, Fayette, Gwinnett, Henry and Rockdale. Fulton county was not included due to the disparity of resources and funding between North and South Fulton, as well as in the City of Atlanta that creates a breadth of external conditions that influence the levels of implementation across the county. Many counties have a number of DRI projects, but two (Fayette and Rockdale Counties) only proposed two DRI projects in the time period of analysis. This is important to keep in mind when viewing completion percentages for these two counties as one project will result in 50% of the overall level of implementation for the county. DRI projects were examined between the years of 2002 and 2008. These projects were proposed during a period of relatively prosperous development rates, and the period of analysis ends as these rates of development begin to decline. The time period is in the recent past, so that most projects have build-out dates that have already passed, giving reasonable cause to believe that they should be completed by now. This time period is not so far in the past, however, that the development standards or regional development plan are outdated.

To execute this implementation review, a shapefile of DRI boundaries was used to create an outline of each DRI site, and laid on top of current satellite imagery provided by Bing aerial maps. A summary of each proposed DRI project is created at the time of their proposal, and includes basic information about the proposed uses and area of the development, identifies any inconsistencies between the current zoning and the proposed land use, and makes suggestions regarding transportation and environmental considerations that should be considered. Using this information to identify generally what should be developed on the site, it can then be compared to the aerial image to determine how far along the development is in implementation. There are four general categories that a development may fall into under this analysis- fully complete, partially complete, incomplete, and in progress. Fully complete projects are those that have been built out to the extent described in the proposal, partially complete projects show some movement

towards a completed project but do not contain the level of density described in the proposal, incomplete projects are those that show no signs of development at all or else just a cleared tract of land, and projects that are in progress have yet to reach their proposed build out date and could conceivably still be in construction if not yet fully completed.

The results show that, overall, 24% of projects were fully built, 28% were partially complete, 43% were entirely incomplete, and 5% were "in progress" and had build out dates that had not yet passed (despite being proposed no later than 2008). These results vary some based on the respective county and number of land uses proposed in the development. A table showing the results of the analysis by county is shown below in both absolute numbers and percentages.

Table 1: Absolute Numbers of project implementation stages

	Cherokee	Clayton	Cobb	DeKalb	Douglas	Fayette	Gwinnett	Henry	Rockdale	**Total**
Fully Complete	3	2	11	10	2	0	12	4	0	44
Partially Complete	11	2	11	8	4	1	9	5	1	52
Incomplete	6	6	12	15	4	1	19	15	1	79
In Progress	2	0	0	2	1	0	1	3	0	9
Total	22	10	34	35	11	2	41	27	2	184

Table 2: Percentages of project implementation stages

	Cherokee	Clayton	Cobb	DeKalb	Douglas	Fayette	Gwinnett	Henry	Rockdale	**Total**
Fully Complete	14%	20%	32%	29%	18%	0%	29%	15%	0%	24%
Partially Complete	50%	20%	32%	23%	36%	50%	22%	19%	50%	28%
Incomplete	27%	60%	35%	43%	36%	50%	46%	56%	50%	43%
In Progress	9%	0%	0%	6%	9%	0%	2%	11%	0%	5%
Total	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%

According to the numbers presented here, 76% of all projects are not being completed as proposed in the DRI application. While it is not the goal of the Georgia DRI program to impose a heavy-handed review process or to limit local development control of jurisdictions, a 24% completion rate suggests that there may be another more efficient way to monitor and manage growth in the region. Perhaps it is something inherent to large scale developments that they require such large amounts of resources and coordination that they are inherently less likely to be implemented, but if that is the case, efforts should be focused either toward encouraging the developments to achieve higher levels of completion, or else spending the resources of the Atlanta Regional Commission in another more effective way. Efforts to increase the implementation of DRI projects assumes that there is benefit to be gained from higher numbers of implemented projects that have gone through the DRI process, which is somewhat substantiated by the positive influence of DRI procedure demonstrated through the case studies.

Suggestions and Next Steps for Georgia

Many of the weaknesses and obstacles identified in the Georgia program arise from inadequate monitoring of the actual impact that the program is having on developments that will have a large regional impact. The process, which was created as a method of growth management, is currently used as a communication facilitation tool. While facilitating communication between involved parties is a valuable and beneficial goal, it does not serve as an adequate method of growth management with communication alone. Georgia should consider the following recommendations to make a growth management tool out of a communication tool.

Continuation of Implementation Review

The above review of project implementation provided some insight into trends regarding development of DRIs in the Metro Atlanta area. A deeper analysis or a continuation of this evaluation, including other potential effects on project implementation would be helpful in creating a reliable foundation to measure the feasibility of other projects during the DRI review. In addition to a robust review of the implementation of past DRI projects, it would be helpful to implement a review mechanism for current and future DRI projects. In Florida this is encompassed by the development order, which requires renewal after a certain time period in order to continue to build. DRIs should be subject to re-review after half of the build out time has passed. If a project is proposed to take ten years to develop, a midterm review after five years could be helpful in monitoring the progress of developments, or in the case that the development has made no progress, the project can be removed from the DRI database. Multiple reviews will hold developers accountable to the suggestions that were made in the original DRI review without having to implement any heavy handed development controls that restrict the actions of the developer. It would also allow the administrators of the program to keep a more accurate record of DRI projects by removing those projects that were never materialized, or to encourage action on a project that has not started.

Midterm reviews should include a summary of the original DRI application including the proposed development and the suggested challenges and changes made to the development as a result. This will also allow administrators to evaluate the effectiveness of the DRI program overall by comparing suggested changes to adopted changes. Additionally, once the project is complete, a brief follow up review may be beneficial in surveying the final outcome and impacts of the development as the DRI program is intended to do. While the midterm review holds developers accountable, the final review analyzes the empiric results of the development

Development Contract

Much of the strength of the Florida DRI program relies on the development order mechanism. The development order is able to require compliance with suggestions in the DRI review, and spurs timely action on developments. Some have complained however that the development order is restrictive to developers, and has ultimately led to worse development as developers break down larger projects into smaller ones in order to avoid DRI review (Anderson, 2015). A more flexible version of a development order would provide the suggestion of regulation and encourage compliance, while not burdening development so severely that developers take measures to avoid triggering the process. A development arrangement in this way might look like a contract between the reviewing regional commission and the project developer under review that details the terms of the project, highlights key recommendations from the review and comment process and requires a signature from both parties merely to acknowledge these terms. This document may be referred to in all subsequent reviews as reference.

Conditional Project Review

There are also changes that can be made within the existing program that will facilitate implementation and create a more accurate database of records. Often it is the case with DRIs in Georgia that significant changes are needed to zoning ordinances or future land use maps in order to accommodate the proposed development. Assuming that this is a barrier to completion of the project, it would be beneficial to the whole process if steps like these were required to be completed prior to applying to the DRI process. This would demonstrate a commitment from the developer to the implementation of the project and hopefully improve some of the inconsistent record of DRI projects. Requiring that developments be consistent with local zoning codes at the start of the review will make the process more efficient and ensure that projects adhere to the future land use desires of the jurisdiction.

Conclusion

Developments of Regional Impact are a program that is ultimately designed as a method of growth management to track the effects of large developments in an area. We have reviewed multiple methods of conducting DRI reviews in the three places where they exist, Georgia, Florida and Chicago. The programs vary in terms of their levels of control that can be exercised by the overseeing body, usually a regional commission, in terms of requiring changes to developments and monitoring implementation. The program in Georgia has very low levels of authority to require changes to plans, and primarily serves as a method of encouraging conversations between stakeholders when a large project is involved. While a valuable outcome of itself, this process can hardly be called a growth management tool. The inconsistencies between the aim of the program and the instituted reality of the program are highlighted through the basic implementation review of past DRI applications. The implementation review revealed an inconsistent and inaccurate database of DRIs, and therefore no way to accurately measure the real impacts that these developments have had on growth in Metro Atlanta. To begin to use the program for growth management as intended, Georgia should consider including an implementation review in the DRI process as a whole, creating a development contract with the developer that clearly delineates the terms of the development for future comparison, or require that all conditions for development be met prior to the DRI review. By including some of these recommendations Georgia can begin to move towards an effective system of tracking the effects and impacts of large-scale development to plan better cities for all.

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Table 3: DCA DRI Threshold Table

Existing DCA Thresholds		DRAFT ARC Thresholds				
Use/Type	**Threshold**	**Notifcation only (except rural and developing rural)**	**Developing Rural, Rural**	**Maturing Neighborhoods, Established Suburbs, and Developing Suburbs**	**Regional Centers, Regional Employment Corridors, and Airport Invesment Area**	**Region Core**
Office	400,000 gross SF	400,000 gross SF	400,000 SF	500,000 SF	600,000 SF	700,000 SF
Retail	300,000 gross SF	300,000 gross SF	300,000 SF	400,000 SF	500,000 SF	600,000 SF
Wholesale/ Distribution	500,000 gross SF	500,000 gross SF	500,000 SF	500,000 SF	500,000 SF	500,000 SF
Hospital/Healthcare	300 new beds; 375 peak hour trips	300 new beds; 375 peak hour trips	300 new beds	400 new beds	500 new beds	600 new beds
Housing	400 units	400 units	400	500	600	700
Industrial/ Manufacturing	500,000 SF, 1600 workers, 400 acres	500,000 SF or 1600 workers	500,000 SF or 1600 workers	500,000 SF or 1600 workers	500,000 SF or 1600 workers	500,000 SF or 1600 workers
Hotels	400 rooms	400 rooms	400	500	600	700
Mixed Use	400,000 SF, 120 acres	400,000 SF (with residential units calculated at 1800 square feet per unit, or the minimum allowed by the host local government)	400,000 SF (with residential units calculated at 1800 square feet per unit, or the minimum allowed by the host local government)	500,000 SF (with residential units calculated at 1500 square feet per unit, or the minimum allowed by the host local government)	600,000 SF (with residential units calculated at 1000 square feet per unit, or the minimum allowed by the host local government)	700,000 SF (with residential units calculated at 1000 square feet per unit, or the minimum allowed by the host local government)
Airports	All new airports, runways and runway extensions	All new airports, runways and runway extensions	New airports and runway extensions of 500 ft or more	New airports and runway extensions of 500 ft or more	New airports and runway extensions of 500 ft or more	New airports and runway extensions of 500 ft or more
Attractions/	1,500, seating capacity of 6,000+	1,500, seating capacity of 6,000+	1,500, seating capacity of 6,000+	1,500, seating capacity of 6,000+	1,500, seating capacity of 6,000+	1,500, seating capacity of 6,000+
Post-secondary	New school with 2,400 students or expansion of at least 25%	New school with 2,400 students or expansion of at least 25%	New school with 2,400 students or expansion of at least 25%	New school with 2,400 students or expansion of at least 25%	New school with 2,400 students or expansion of at least 25%	New school with 2,400 students or expansion of at least 25%
Waste Handling Facilities	New facility or expansion by more than 50%	New facility or expansion by more than 50%	New facility within 1 mile of public facility (airport, school, resevoir, river,...), otherwise, notification only	New facility within 1 mile of public facility (airport, school, resevoir, river,...), otherwise, notification only	New facility within 1 mile of public facility (airport, school, resevoir, river,...), otherwise, notification only	New facility within 1 mile of public facility (airport, school, resevoir, river,...), otherwise, notification only
Quarries, Asphalt & Cement	New facility or expansion by more than 50%	New facility or expansion by more than 50%	New facility within 1 mile of public facility (airport, school, resevoir, river,...), otherwise, notification only	New facility within 1 mile of public facility (airport, school, resevoir, river,...), otherwise, notification only	New facility within 1 mile of public facility (airport, school, resevoir, river,...), otherwise, notification only	New facility within 1 mile of public facility (airport, school, resevoir, river,...), otherwise, notification only
Waste Water Treatment	New major conventional treatment facility or expansion by more than 50%	Notification only (MNGWPD)	Notification only (MNGWPD)	Notification only (MNGWPD)	Notification only (MNGWPD)	Notification only (MNGWPD)
Petroleum Storage Facilities	50,000 barrels if within 1,000 ft of water supply	50,000 barrels if within 1,000 ft of water supply	50,000 barrels if within 1,000 ft of water supply	50,000 barrels if within 1,000 ft of water supply	50,000 barrels if within 1,000 ft of water supply	50,000 barrels if within 1,000 ft of water supply
Water Supply	New facilities	Notification only (MNGWPD)	Notification only (MNGWPD)	Notification only (MNGWPD)	Notification only (MNGWPD)	Notification only (MNGWPD)
Intermodal Terminals	New facilities	New facilities	New facilities	New facilities	New facilities	New facilities
Truck Stops	More than three diesel fuel pumps	10 or more diesel fuel pumps or 20 or more truck parking spaces	10 or more diesel fuel pumps or 20 or more truck parking spaces	10 or more diesel fuel pumps or 20 or more truck parking spaces	10 or more diesel fuel pumps or 20 or more truck parking spaces	10 or more diesel fuel pumps or 20 or more truck parking spaces
Correctional/ Detention Facilities	Greater than 300 new beds; or generating more than 375 peak hour vehicle trips per day	Greater than 300 new beds; or generating more than 375 peak hour vehicle trips	Greater than 300 new beds; or generating more than 375 peak hour vehicle trips	Greater than 300 new beds; or generating more than 375 peak hour vehicle trips	Greater than 300 new beds; or generating more than 375 peak hour vehicle trips	Greater than 300 new beds; or generating more than 375 peak hour vehicle trips
Other uses not referenced specifically in this table	1000 spaces or 5,000 daily trips	1000 spaces or 5,000 daily trips	1000 spaces or 5,000 daily trips	1000 spaces or 5,000 daily trips	1000 spaces or 5,000 daily trips	1000 spaces or 5,000 daily trips

		Georgia	Florida	Chicago
Technical Feasibility	Effectiveness			
	Adequacy			
Economic and Financial Feasibility	Fiscal benefits to government			
	Fiscal costs to government			
	Societal Benefits			
	Societal Costs			
Political Viability				
Administrative Operability				

Table 4: DRI Program Comparison Matrix